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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

AUG 24 2005
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SUE BEITIA, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

| | | |
|---------------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, |) | CR. NO. 05-00248 JMS |
| |) | |
| Plaintiff, |) | FIRST SUPERSEDING |
| |) | INDICTMENT |
| vs. |) | |
| |) | |
| VIRGINIA M. ROSAS GUERRERO, (1) |) | [21 U.S.C. §§ 846; 841(a)(1), |
| ROBERT ALEXANDER SIGOUIN, (2) |) | 841(b)(1)(B)] |
| KEVIN PATRICK CASH, (3) |) | |
| |) | |
| Defendants. |) | |
| |) | |

FIRST SUPERSEDING INDICTMENT

Count 1

The Grand Jury charges that:

From a date unknown and continuing up to and including
May 29, 2005, in the District of Hawaii, and elsewhere,
Defendants VIRGINIA M. ROSAS GUERRERO ("ROSAS GUERRERO"), ROBERT

ALEXANDER SIGOUIN ("SIGOUIN") and KEVIN PATRICK CASH ("CASH"), did knowingly and intentionally combine, conspire, confederate and agree together and with others, known and unknown, to knowingly and intentionally distribute and possess, with intent to distribute, 100 grams or more, to wit: approximately 361 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21 United States Code, Sections 846, 841(a)(1) & (b)(1)(B).

OVERT ACTS

In furtherance of this conspiracy and in order to attain the objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

1. On or about May 29, 2005, Defendant ROSAS GUERRERO traveled from Los Angeles, California to Honolulu, Hawaii on ATA Airlines Flight 4755, carrying quantities of heroin on her person.

2. In or about May, 2005, Defendant SIGOUIN transported cash to hotels in Waikiki to obtain heroin from ROSAS GUERRERO.

3. On or about May 29, 2005, SIGOUIN traveled to Ohana Maile Sky Court Hotel in Honolulu, Hawaii to meet with ROSA GUERRERO for the purpose of obtaining heroin.

4. In or about May, 2005 Defendant CASH paid ROSAS

GUERRERO \$3500 for an amount of heroin.

5. On or about May 29, 2005, CASH drove to Ala Moana Shopping Center to meet ROSAS GUERRERO for the purpose of obtaining approximately 50 grams of heroin.

All in violation of Title 21, United States Code, Section 846.

Count 2

The Grand Jury further charges:

On or about May 29, 2005, in the District of Hawaii, Defendants ROSAS GUERRERO and ROBERT ALEXANDER SIGOUIN did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, to wit, approximately 361 grams, a Schedule I controlled substance.


All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

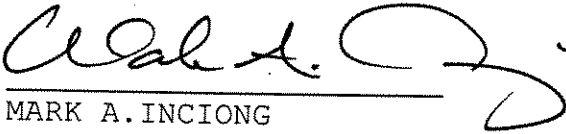
DATED: August 24, 2005 at Honolulu, Hawaii.

A TRUE BILL

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FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii


FLORENCE T. NAKAKUNI
Chief, Narcotics Section


MARK A. INCIONG
Assistant U.S. Attorney

U.S. v. VIRGINIA M. ROSAS GUERRERO, ET AL.
Cr. No. 05-00248 JMS
"First Superseding Indictment"